

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**JULIA HUBBARD and KAYLA
GOEDINGHAUS,**

Plaintiffs,

V.

Case No. 5:23-cv-00580-FB

TRAMMELL S. CROW, JR.; BENJAMIN TODD ELLER; RICHARD HUBBARD; MELISSA MILLER; SCOTT WOODS; MRUGESHKUMAR SHAH; MICHAEL CAIN; COE JURACEK; PHILIP ECOB; H.J. COLE; CODY MITCHELL; KURT KNEWITZ; RALPH ROGERS; ROBERT PRUITT; SCOTT BRUNSON; CASE GROVER; RICHARD BUTLER; MICHAEL HYNES, JR.; SHAWN MAYER; JADE MAYER; AARON BURLINGAME; and RCI HOSPITALITY HOLDINGS, INC.

Defendants.

COE JURACEK'S ANSWER TO PLAINTIFFS' SECOND AMENDED COMPLAINT

Defendant Coe Juracek (“Juracek”) by and through his undersigned attorneys, answers the allegations of Plaintiffs Julia Hubbard and Kayla Goedinghaus’ (collectively, “Plaintiffs”) Second Amended Complaint as follows:

1. Mr. Juracek denies the allegations in paragraph 1 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 1 and, on that basis, denies them.

2. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 2 and, on that basis, denies them.

3. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 3 and, on that basis, denies them.

4. Mr. Juracek denies the allegations in paragraph 4 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 4 and, on that basis, denies them.

5. Mr. Juracek denies the allegations in paragraph 5 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 5 and, on that basis, denies them.

6. Mr. Juracek denies the allegations in paragraph 6 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 6, which also appear to state legal conclusions to which no response is required, and on that basis denies them.

7. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 7 and, on that basis, denies them.

8. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 8 and, on that basis, denies them.

9. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 9 and, on that basis, denies them.

10. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 10 and, on that basis, denies them.

11. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 11 and, on that basis, denies them.

12. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 12 and, on that basis, denies them.

13. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 13 and, on that basis, denies them.

14. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 14 and, on that basis, denies them.

15. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 15 and, on that basis, denies them.

16. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 16 and, on that basis, denies them.

17. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 17 and, on that basis, denies them.

18. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 18 and, on that basis, denies them.

19. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 19 and, on that basis, denies them.

20. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 20 and, on that basis, denies them.

21. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 21 and, on that basis, denies them.

22. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 22 and, on that basis, denies them.

23. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 23 and, on that basis, denies them.

24. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 24 and, on that basis, denies them.

25. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 25 and, on that basis, denies them.

26. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 26 and, on that basis, denies them.

27. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 27 and, on that basis, denies them.

28. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 28 and, on that basis, denies them.

29. Upon information and belief, Mr. Juracek admits that Trammell S. Crow is a “philanthropist.” Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 29 and, on that basis, denies them.

30. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 30 and, on that basis, denies them.

31. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 31 and, on that basis, denies them.

32. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 32 and, on that basis, denies them.

33. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 33 and, on that basis, denies them.

34. Mr. Juracek denies the allegations in paragraph 34 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 34 and on that basis denies them.

35. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 35 and, on that basis, denies them.

36. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 36 and, on that basis, denies them.

37. Mr. Juracek denies the allegations in paragraph 37 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 37 and on that basis denies them.

38. Mr. Juracek denies the allegations in paragraph 38 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 38 and, on that basis, denies them.

39. Mr. Juracek admits that he is a Senior Managing Director at Crow Holdings Capital. Mr. Juracek denies the allegations in paragraph 39 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 39 and, on that basis, denies them.

40. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 40 and, on that basis, denies them.

41. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 41 and, on that basis, denies them.

42. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 42 and, on that basis, denies them.

43. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 43 and, on that basis, denies them.

44. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 44 and, on that basis, denies them.

45. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 45 and, on that basis, denies them.

46. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 46 and, on that basis, denies them.

47. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 47 and, on that basis, denies them.

48. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 48 and, on that basis, denies them.

49. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 49 and, on that basis, denies them.

50. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 50 and, on that basis, denies them.

51. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 51 and, on that basis, denies them.

52. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 52, which also states a legal conclusion to which no response is required, and on that basis denies them.

53. Paragraph 53 sets forth a legal conclusion to which no response is required and it is therefore denied.

54. Paragraph 54 sets forth a legal conclusion to which no response is required and it is therefore denied.

55. Paragraph 55 sets forth a legal conclusion to which no response is required and it is therefore denied.

56. Paragraph 56 sets forth a legal conclusion to which no response is required and it is therefore denied.

57. Mr. Juracek denies the allegations in paragraph 57 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 57, which also states a legal conclusion to which no response is required, and, on that basis, denies them.

58. Paragraph 58 sets forth a legal conclusion to which no response is required and it is therefore denied.

59. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 59 and, on that basis, denies them.

60. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 60 and, on that basis, denies them.

61. Upon information and belief, Mr. Juracek admits the allegations in paragraph 61.

62. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 62 and, on that basis, denies them.

63. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 63 and, on that basis, denies them.

64. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 64 and, on that basis, denies them.

65. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 65 and, on that basis, denies them.

66. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 66 and, on that basis, denies them.

67. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 67 and, on that basis, denies them.

68. Mr. Juracek admits the allegation in paragraph 68.

69. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 69 and, on that basis, denies them.

70. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 70 and, on that basis, denies them.

71. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 71 and, on that basis, denies them.

72. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 72 and, on that basis, denies them.

73. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 73 and, on that basis, denies them.

74. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 74 and, on that basis, denies them.

75. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 75 and, on that basis, denies them.

76. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 76 and, on that basis, denies them.

77. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 77 and, on that basis, denies them.

78. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 78 and, on that basis, denies them.

79. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 79 and, on that basis, denies them.

80. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 80 and, on that basis, denies them.

81. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 81 and, on that basis, denies them.

82. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 82 and, on that basis, denies them.

83. Paragraph 83 does not set forth any allegations and, therefore, no response is required. To the extent a response is required, Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 83 and, on that basis, denies them.

84. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 84 and, on that basis, denies them.

85. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 85 and, on that basis, denies them.

86. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 86 and, on that basis, denies them.

87. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 87 and, on that basis, denies them.

88. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 88 and, on that basis, denies them.

89. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 89 and, on that basis, denies them.

90. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 90 and, on that basis, denies them.

91. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 91 and, on that basis, denies them.

92. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 92 and, on that basis, denies them.

93. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 93 and, on that basis, denies them.

94. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 94 and, on that basis, denies them.

95. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 95 and, on that basis, denies them.

96. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 96 and, on that basis, denies them.

97. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 97 and, on that basis, denies them.

98. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 98 and, on that basis, denies them.

99. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 99 and, on that basis, denies them.

100. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 100 and, on that basis, denies them.

101. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 101 and, on that basis, denies them.

102. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 102 and, on that basis, denies them.

103. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 103 and, on that basis, denies them.

104. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 104 and, on that basis, denies them.

105. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 105 and, on that basis, denies them.

106. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 106 and, on that basis, denies them.

107. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 107 and, on that basis, denies them.

108. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 108 and, on that basis, denies them.

109. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 109 and, on that basis, denies them.

110. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 110 and, on that basis, denies them.

111. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 111 and, on that basis, denies them.

112. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 112 and, on that basis, denies them.

113. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 113 and, on that basis, denies them.

114. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 114 and, on that basis, denies them.

115. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 115 and, on that basis, denies them.

116. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 116 and, on that basis, denies them.

117. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 117 and, on that basis, denies them.

118. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 118 and, on that basis, denies them.

119. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 119 and, on that basis, denies them.

120. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 120 and, on that basis, denies them.

121. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 121 and, on that basis, denies them.

122. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 122 and, on that basis, denies them.

123. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 123 and, on that basis, denies them.

124. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 124 and, on that basis, denies them.

125. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 125 and, on that basis, denies them.

126. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 126 and, on that basis, denies them.

127. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 127 and, on that basis, denies them.

128. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 128 and, on that basis, denies them.

129. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 129 and, on that basis, denies them.

130. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 130 and, on that basis, denies them.

131. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 131 and, on that basis, denies them.

132. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 132 and, on that basis, denies them.

133. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 133 and, on that basis, denies them.

134. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 134 and, on that basis, denies them.

135. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 135 and, on that basis, denies them.

136. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 136 and, on that basis, denies them.

137. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 137 and, on that basis, denies them.

138. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 138 and, on that basis, denies them.

139. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 139 and, on that basis, denies them.

140. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 140 and, on that basis, denies them.

141. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 141 and, on that basis, denies them.

142. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 142 and, on that basis, denies them.

143. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 143 and, on that basis, denies them.

144. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 144 and, on that basis, denies them.

145. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 145 and, on that basis, denies them.

146. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 146 and, on that basis, denies them.

147. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 147 and, on that basis, denies them.

148. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 148 and, on that basis, denies them.

149. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 149 and, on that basis, denies them.

150. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 150 and, on that basis, denies them.

151. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 151 and, on that basis, denies them.

152. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 152 and, on that basis, denies them.

153. Upon information and belief, Mr. Juracek admits that Trammell Crow is “the son of a prominent Dallas real estate family.” Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 153 and, on that basis, denies them.

154. Mr. Juracek denies the allegations in paragraph 154 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 154 and, on that basis, denies them.

155. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 155 and, on that basis, denies them.

156. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 156 and, on that basis, denies them.

157. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 157 and, on that basis, denies them.

158. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 158 and, on that basis, denies them.

159. Upon information and belief, Mr. Juracek admits that Crow Holdings was involved in the development of a number of buildings across the United States, including the Embarcadero Center in San Francisco and the Peachtree Center in Atlanta. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 159 and, on that basis, denies them.

160. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 160 and, on that basis, denies them.

161. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 161 and, on that basis, denies them.

162. Upon information and belief, Mr. Juracek admits that Mr. Crow hosts a “twice-annual camping event in the fall and spring each year, called ‘Kiddie Campout’ for fathers and their children” that requires an “invitation from Crow.” Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 162 and, on that basis, denies them.

163. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 163 and, on that basis, denies them.

164. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 164 and, on that basis, denies them.

165. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 165 and, on that basis, denies them.

166. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 166 and, on that basis, denies them.

167. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 167 and, on that basis, denies them.

168. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 168 and, on that basis, denies them.

169. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 169 and, on that basis, denies them.

170. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 170 and, on that basis, denies them.

171. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 171 and, on that basis, denies them.

172. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 172 and, on that basis, denies them.

173. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 173 and, on that basis, denies them.

174. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 174 and, on that basis, denies them.

175. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 175 and, on that basis, denies them.

176. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 176 and, on that basis, denies them.

177. Mr. Juracek denies the allegations in paragraph 177 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 177 and on that basis denies them.

178. Mr. Juracek denies the allegations in paragraph 178 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 178 and on that basis denies them.

179. Mr. Juracek denies the allegations in paragraph 179 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 179 and on that basis denies them.

180. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 180 and, on that basis, denies them.

181. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 181 and, on that basis, denies them.

182. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 182 and, on that basis, denies them.

183. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 183 and, on that basis, denies them.

184. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 184 and, on that basis, denies them.

185. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 185 and, on that basis, denies them.

186. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 186 and, on that basis, denies them.

187. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 187 and, on that basis, denies them.

188. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 188 and, on that basis, denies them.

189. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 189 and, on that basis, denies them.

190. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 190 and, on that basis, denies them.

191. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 191 and, on that basis, denies them.

192. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 192 and, on that basis, denies them.

193. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 193 and, on that basis, denies them.

194. Mr. Juracek admits that Philip Ecob “previously worked at Crow Holdings Capital.” Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 194 and, on that basis, denies them.

195. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 195 and, on that basis, denies them.

196. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 196 and, on that basis, denies them.

197. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 197 and, on that basis, denies them.

198. Mr. Juracek admits he is “a Senior Managing Director at Crow Holdings Capital and [a] member of its investment committee.” Mr. Juracek further admits that he has attended Mr. Crow’s Kiddie Campout where numerous other fathers and their children, including Mr. Crow and Rick Hubbard, were present. Mr. Juracek denies the remaining allegations in paragraph 198.

199. Mr. Juracek denies the allegations in paragraph 199.

200. Mr. Juracek denies the allegations in paragraph 200.

201. Mr. Juracek denies the allegations in paragraph 201.

202. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 202 and, on that basis, denies them.

203. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 203 and, on that basis, denies them.

204. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 204 and, on that basis, denies them.

205. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 205 and, on that basis, denies them.

206. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 206 and, on that basis, denies them.

207. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 207 and, on that basis, denies them.

208. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 208 and, on that basis, denies them.

209. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 209 and, on that basis, denies them.

210. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 210 and, on that basis, denies them.

211. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 211 and, on that basis, denies them.

212. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 212 and, on that basis, denies them.

213. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 213 and, on that basis, denies them.

214. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 214 and, on that basis, denies them.

215. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 215 and, on that basis, denies them.

216. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 216 and, on that basis, denies them.

217. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 217 and, on that basis, denies them.

218. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 218 and, on that basis, denies them.

219. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 219 and, on that basis, denies them.

220. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 220 and, on that basis, denies them.

221. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 221 and, on that basis, denies them.

222. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 222 and, on that basis, denies them.

223. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 223 and, on that basis, denies them.

224. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 224 and, on that basis, denies them.

225. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 225 and, on that basis, denies them.

226. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 226 and, on that basis, denies them.

227. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 227 and, on that basis, denies them.

228. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 228 and, on that basis, denies them.

229. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 229 and, on that basis, denies them.

230. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 230 and, on that basis, denies them.

231. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 231 and, on that basis, denies them.

232. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 232 and, on that basis, denies them.

233. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 233 and, on that basis, denies them.

234. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 234 and, on that basis, denies them.

235. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 235 and, on that basis, denies them.

236. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 236 and, on that basis, denies them.

237. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 237 and, on that basis, denies them.

238. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 238 and, on that basis, denies them.

239. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 239 and, on that basis, denies them.

240. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 240 and, on that basis, denies them.

241. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 241 and, on that basis, denies them.

242. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 242 and, on that basis, denies them.

243. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 243 and, on that basis, denies them.

244. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 244 and, on that basis, denies them.

245. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 245 and, on that basis, denies them.

246. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 246 and, on that basis, denies them.

247. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 247 and, on that basis, denies them.

248. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 248 and, on that basis, denies them.

249. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 249 and, on that basis, denies them.

250. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 250 and, on that basis, denies them.

251. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 251 and, on that basis, denies them.

252. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 252 and, on that basis, denies them.

253. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 253 and, on that basis, denies them.

254. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 254 and, on that basis, denies them.

255. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 255 and, on that basis, denies them.

256. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 256 and, on that basis, denies them.

257. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 257 and, on that basis, denies them.

258. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 258 and, on that basis, denies them.

259. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 259 and, on that basis, denies them.

260. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 260 and, on that basis, denies them.

261. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 261 and, on that basis, denies them.

262. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 262 and, on that basis, denies them.

263. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 263 and, on that basis, denies them.

264. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 264 and, on that basis, denies them.

265. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 265 and, on that basis, denies them.

266. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 266 and, on that basis, denies them.

267. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 267 and, on that basis, denies them.

268. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 268 and, on that basis, denies them.

269. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 269 and, on that basis, denies them.

270. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 270 and, on that basis, denies them.

271. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 271 and, on that basis, denies them.

272. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 272 and, on that basis, denies them.

273. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 273 and, on that basis, denies them.

274. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 274 and, on that basis, denies them.

275. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 275 and, on that basis, denies them.

276. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 276 and, on that basis, denies them.

277. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 277 and, on that basis, denies them.

278. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 278 and, on that basis, denies them.

279. Mr. Juracek denies the allegations in paragraph 279 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 279 and, on that basis, denies them.

280. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 280 and, on that basis, denies them.

281. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 281 and, on that basis, denies them.

282. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 282 and, on that basis, denies them.

283. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 283 and, on that basis, denies them.

284. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 284 and, on that basis, denies them.

285. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 285 and, on that basis, denies them.

286. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 286 and, on that basis, denies them.

287. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 287 and, on that basis, denies them.

288. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 288 and, on that basis, denies them.

289. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 289 and, on that basis, denies them.

290. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 290 and, on that basis, denies them.

291. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 291 and, on that basis, denies them.

292. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 292 and, on that basis, denies them.

293. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 293 and, on that basis, denies them.

294. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 294 and, on that basis, denies them.

295. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 295 and, on that basis, denies them.

296. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 296 and, on that basis, denies them.

297. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 297 and, on that basis, denies them.

298. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 298 and, on that basis, denies them.

299. Paragraph 299 sets forth a legal conclusion to which no response is required and it is therefore denied.

300. Mr. Juracek denies the allegations in paragraph 300 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 300, which appear to set forth a legal conclusion to which no response is required, and, on that basis, denies them.

301. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 301 and, on that basis, denies them.

302. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 302 and, on that basis, denies them.

303. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 303 and, on that basis, denies them.

304. Mr. Juracek denies the allegations in paragraph 304 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 304 and, on that basis, denies them.

305. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 305 and, on that basis, denies them.

306. Mr. Juracek denies the allegations in paragraph 306 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 306 and, on that basis, denies them.

307. Mr. Juracek denies the allegations in paragraph 307 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 307 and, on that basis, denies them.

308. Mr. Juracek denies the allegations in paragraph 308 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 308 and, on that basis, denies them.

309. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 309 and, on that basis, denies them.

310. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 310 and, on that basis, denies them.

311. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 311 and, on that basis, denies them.

312. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 312 and, on that basis, denies them.

313. Mr. Juracek denies the allegations in paragraph 313 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 313 and, on that basis, denies them.

314. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 314 and, on that basis, denies them.

315. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 315 and, on that basis, denies them.

316. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 316 and, on that basis, denies them.

317. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 317 and, on that basis, denies them.

318. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 318 and, on that basis, denies them.

319. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 319 and, on that basis, denies them.

320. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 320 and, on that basis, denies them.

321. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 321 and, on that basis, denies them.

322. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 322 and, on that basis, denies them.

323. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 323 and, on that basis, denies them.

324. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 324 and, on that basis, denies them.

325. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 325 and, on that basis, denies them.

326. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 326 and, on that basis, denies them.

327. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 327 and, on that basis, denies them.

328. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 328 and, on that basis, denies them.

329. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 329 and, on that basis, denies them.

330. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 330 and, on that basis, denies them.

331. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 331 and, on that basis, denies them.

332. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 332 and, on that basis, denies them.

333. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 333 and, on that basis, denies them.

334. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 334 and, on that basis, denies them.

335. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 335 and, on that basis, denies them.

336. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 336 and, on that basis, denies them.

337. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 337 and, on that basis, denies them.

338. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 338 and, on that basis, denies them.

339. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 339 and, on that basis, denies them.

340. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 340 and, on that basis, denies them.

341. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 341 and, on that basis, denies them.

342. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 342 and, on that basis, denies them.

343. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 343 and, on that basis, denies them.

344. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 344 and, on that basis, denies them.

345. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 345 and, on that basis, denies them.

346. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 346 and, on that basis, denies them.

347. Mr. Juracek denies the allegations in paragraph 347. Paragraph 347 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

348. Mr. Juracek denies the allegations in paragraph 348.

349. Mr. Juracek denies the allegations in paragraph 349.

350. Mr. Juracek denies the allegations in paragraph 350.

351. Mr. Juracek denies the allegations in paragraph 351. Paragraph 351 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

352. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 352 and, on that basis, denies them.

353. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 353 and, on that basis, denies them.

354. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 354 and, on that basis, denies them.

355. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 355 and, on that basis, denies them.

356. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 356 and, on that basis, denies them.

357. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 357 and, on that basis, denies them.

358. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 358 and, on that basis, denies them.

359. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 359 and, on that basis, denies them.

360. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 360 and, on that basis, denies them.

361. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 361 and, on that basis, denies them.

362. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 362 and, on that basis, denies them.

363. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 363 and, on that basis, denies them.

364. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 364 and, on that basis, denies them.

365. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 365 and, on that basis, denies them.

366. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 366 and, on that basis, denies them.

367. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 367 and, on that basis, denies them.

368. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 368 and, on that basis, denies them.

369. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 369 and, on that basis, denies them.

370. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 370 and, on that basis, denies them.

371. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 371 and, on that basis, denies them.

372. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 372 and, on that basis, denies them.

373. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 373 and, on that basis, denies them.

374. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 374 and, on that basis, denies them.

375. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 375 and, on that basis, denies them.

376. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 376 and, on that basis, denies them.

377. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 377 and, on that basis, denies them.

378. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 378 and, on that basis, denies them.

379. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 379 and, on that basis, denies them.

380. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 380 and, on that basis, denies them.

381. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 381 and, on that basis, denies them.

382. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 382 and, on that basis, denies them.

383. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 383 and, on that basis, denies them.

384. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 384 and, on that basis, denies them.

385. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 385 and, on that basis, denies them.

386. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 386 and, on that basis, denies them.

387. Paragraph 387 sets forth a legal conclusion to which no response is required and it is therefore denied.

388. Mr. Juracek denies the allegations in paragraph 388 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 388 and, on that basis, denies them. Paragraph 388 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

389. Mr. Juracek denies the allegations in paragraph 389 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 389 and, on that basis, denies them. Paragraph 389 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

390. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 390 and, on that basis, denies them. Paragraph 390 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

391. Mr. Juracek denies the allegations in paragraph 391 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 391 and, on that basis, denies them. Paragraph 391 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

392. Mr. Juracek denies the allegations in paragraph 392 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 392 and, on that basis, denies them. Paragraph 392 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

393. Mr. Juracek denies the allegations in paragraph 393 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 393 and, on that basis, denies them. Paragraph 393 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

394. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 394 and, on that basis, denies them. Paragraph 394 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

395. Mr. Juracek denies the allegations in paragraph 395 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 395 and, on that basis, denies them. Paragraph 395 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

396. Mr. Juracek incorporates by reference all previous responses to Plaintiffs' allegations.

397. Mr. Juracek denies the allegations in paragraph 397 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 397 and, on that basis, denies them. Paragraph 397 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

398. Mr. Juracek denies the allegations in paragraph 398 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 398 and, on that basis, denies them. Paragraph 398 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

399. Mr. Juracek denies the allegations in paragraph 399 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 399 and, on that basis, denies them. Paragraph 399 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

400. Mr. Juracek incorporates by reference all previous responses to Plaintiffs' allegations.

401. Mr. Juracek denies the allegations in paragraph 401 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 401 and, on that basis, denies them. Paragraph 401 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

402. Mr. Juracek denies the allegations in paragraph 402 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 402 and, on that basis, denies them. Paragraph 402 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

403. Mr. Juracek denies the allegations in paragraph 403 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 403 and, on that basis, denies them. Paragraph 403 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

404. Mr. Juracek incorporates by reference all previous responses to Plaintiffs' allegations.

405. Mr. Juracek denies the allegations in paragraph 405 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 405 and, on that basis, denies them. Paragraph 405 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

406. Mr. Juracek denies the allegations in paragraph 406 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 406 and, on that basis, denies them. Paragraph 406 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

407. Mr. Juracek denies the allegations in paragraph 407 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 407 and, on that basis, denies them. Paragraph 407 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

408. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the allegations in paragraph 408 and, on that basis, denies them. Paragraph 408 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

409. Mr. Juracek denies the allegations in paragraph 409 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 409 and, on that basis, denies them. Paragraph 409 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

410. Mr. Juracek denies the allegations in paragraph 410 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 410 and, on that basis, denies them. Paragraph 410 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

411. Mr. Juracek denies the allegations in paragraph 411 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 411 and, on that basis, denies them. Paragraph 411 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

412. Mr. Juracek denies the allegations in paragraph 412 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 412 and, on that basis, denies them. Paragraph 412 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

413. Mr. Juracek denies the allegations in paragraph 413 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 413 and, on that basis, denies them. Paragraph 413 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

414. Mr. Juracek incorporates by reference all previous responses to Plaintiffs' allegations.

415. Mr. Juracek denies the allegations in paragraph 415 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 415 and, on that basis, denies them. Paragraph 415 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

416. Mr. Juracek denies the allegations in paragraph 416 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 416 and, on that basis, denies them. Paragraph 416 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

417. Mr. Juracek denies the allegations in paragraph 417 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 417 and, on that basis, denies them. Paragraph 417 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

418. Mr. Juracek denies the allegations in paragraph 418 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 418 and, on that basis, denies them. Paragraph 418 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

419. Mr. Juracek denies the allegations in paragraph 419 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 419 and, on that basis, denies them. Paragraph 419 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

420. Mr. Juracek denies the allegations in paragraph 420 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 420 and, on that basis, denies them. Paragraph 420 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

421. Mr. Juracek denies the allegations in paragraph 421 to the extent they pertain to him. Mr. Juracek lacks sufficient knowledge and information as to the accuracy of the other allegations in paragraph 421 and, on that basis, denies them. Paragraph 421 also sets forth a legal conclusion to which no response is required and it is therefore denied on that basis as well.

PRAYER

Mr. Juracek denies that Plaintiffs are entitled to any of the relief sought in their prayer.

GENERAL DENIAL

Mr. Juracek denies each and every allegation in the Second Amended Complaint not expressly admitted above.

AFFIRMATIVE AND OTHER DEFENSES

Mr. Juracek asserts the following affirmative and other defenses without prejudice to his position that he does not have the burden of proof to establish these defenses to the extent that the burden on the issue rests with Plaintiffs as a matter of law. Mr. Juracek reserves the right to assert additional defenses that become known during this action.

FIRST DEFENSE
(Statute of Limitations)

All or some of the purported claims set forth in the Second Amended Complaint are barred by the applicable statute of limitations, including, but not limited to, the four-year statute of limitations that Civil RICO actions are subject to.

SECOND DEFENSE
(*In Pari Delicto*)

Plaintiffs' claims are barred in whole or in part by the doctrine of *in pari delicto* because, to the extent any of the alleged conduct occurred, Plaintiffs were knowing and active participants in it and received benefits therefrom.

THIRD DEFENSE
(Failure to Mitigate)

Plaintiffs' claims are barred, in whole or in part, or, at a minimum, recovery should be reduced pursuant to the doctrines of avoidable consequences and/or failure to mitigate. To the extent Plaintiffs may have suffered any damages, they were required to take reasonable and timely actions to limit their losses which they failed to do.

FOURTH DEFENSE
(Contributory or Comparative Fault)

Mr. Juracek denies that Plaintiffs suffered any form of damages. However, Plaintiffs' alleged damages, if any, were caused, in whole or in part, by the acts or omissions of Plaintiffs themselves, third parties, or other defendants to this matter over which Mr. Juracek had no control and for which Mr. Juracek is not legally responsible. As such, Plaintiffs' recovery, if any, should be barred or proportionately reduced by the fault or degree of responsibility of Plaintiffs, third parties, and/or other defendants to this matter.

FIFTH DEFENSE

(Failure to Join Indispensable Parties, Misjoinder of Parties and/or Wrong Parties)

Plaintiffs' claims are barred, in whole or in part, because they failed to join indispensable parties to this litigation, improperly joined parties and/or named the wrong parties in the Second Amended Complaint.

SIXTH DEFENSE

(Damages Too Speculative, Conjectural, Improbable, and/or Remote)

Mr. Juracek denies that Plaintiffs suffered any form of damages. However, Plaintiffs' alleged damages, as asserted in their Second Amended Complaint, are purely conjectural, highly improbable, too remote, and/or speculative such that this Court is not able to grant any justiciable remedy or relief.

SEVENTH DEFENSE

(Offset or Setoff)

If any loss, injury, damages, or detriment occurred as alleged in the Second Amended Complaint, Mr. Juracek is entitled to an offset or setoff for the amounts Plaintiffs recover from any other person for such loss, injury, damages, or detriment including, but not limited to, amounts recovered from any settling party.

EIGHTH DEFENSE

(Res Judicata and Collateral Estoppel)

Plaintiffs' claims are barred, in whole or in part, by the doctrines of res judicata, transactional res judicata, and/or collateral estoppel based on prior litigation between Plaintiffs and some of the defendants because their present claims arise out of the same transaction or occurrence that was the subject matter of claims in prior litigation and/or involved the same aggregate of operative facts.

REQUEST FOR RELIEF

Mr. Juracek respectfully requests that the Court enter judgment in his favor and against Plaintiffs as follows:

1. Dismissing, with prejudice, Plaintiffs' claims against Mr. Juracek;
2. Denying all relief Plaintiffs seek against Mr. Juracek;
3. Entering judgment in favor of Mr. Juracek;
4. Awarding Mr. Juracek his costs incurred in this action; and
5. Awarding Mr. Juracek any other relief that is just and equitable.

Dated: April 4, 2024

/s/ Diane M. Doolittle

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CERTIFICATE OF SERVICE

The foregoing document was filed under the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties who have appeared in this action on the date of such service.

/s/ *Evan Pearson*

Evan Pearson